Leon E. Comeaux & Associates

Geological & Petroleum Consultants P. O. Box 53922 Lafayette, Louisiana 70505

Leon E. Comeaux William S. McAlister, Jr. David W. Comeaux

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November 13, 2002

Mr. John Aldridge
Department of Natural Resources
Office of Conservation
P.O. Box 94275
Baton Rouge, Louisiana 70804-9275

RE: REQUEST FOR EMERGENCY APPLICATION

Planulina Zone ST. AMELIA FIELD

St. James Parish, Louisiana

Dear Sir:

On behalf of BTA Oil Producers, request is hereby made for a waiver to Rule 8 of the Revised Rules of Procedure. Please be advised that the tract colored in yellow on the attached plat will expire January 18, 2003.

Please be assured that if a waiver of the preapplication notice is granted, we will fully comply with Rule 8 of the Rules of Procedure.

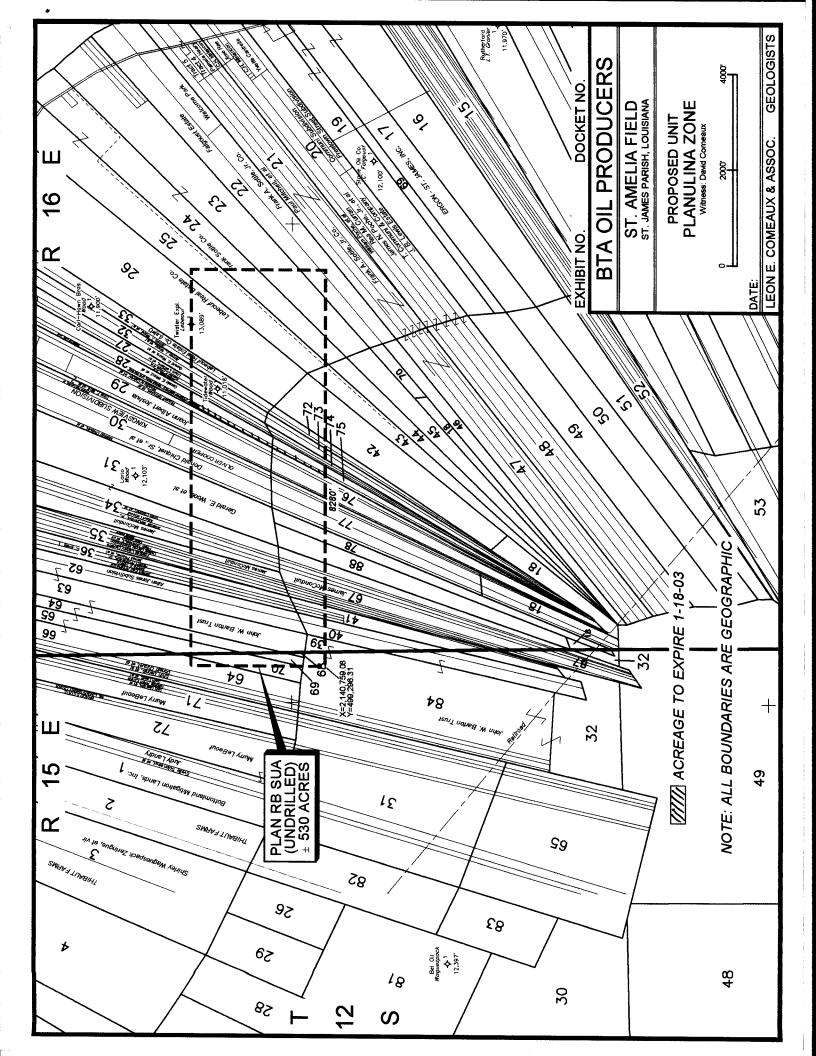
Sincerely,

LEON E. COMEAUX & ASSOCIATES

David Comeaux

DWC/af Enclosure

cc: Mr. Richard Hudson Mr. Bob Crawford



Leon E. Comeaux & Associates

Geological & Petroleum Consultants P. O. Box 53922 Lafayette, Louisiana 70505

Leon E. Comeaux William S. McAlister, Jr. David W. Comeaux

November 14, 2002

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Honorable James H. "Jim" Welsh Commissioner of Conservation Department of Natural Resources Office of Conservation P. O. Box 94275 Baton Rouge, Louisiana 70804-9275

RE: EMERGENCY APPLICATION

Planulina Zone
ST. AMELIA FIELD
St. James Barish Levision

St. James Parish, Louisiana

Dear Sir:

Application is hereby made on behalf of BTA Oil Producers, to the Commissioner of Conservation for the calling of a public hearing, after legal notice, to consider evidence relative to the issuance of an order pertaining to the following matters relating to the Planulina Zone, Reservoir B, in the St. Amelia Field, St. James Parish, Louisiana.

- 1. To establish rules and regulations governing the exploration for and production of gas and condensate from the Planulina Zone, Reservoir B, in the St. Amelia Field, St. James Parish, Louisiana.
- 2. To create a single drilling and production unit for this zone and to force pool and integrate all separately owned tracts, mineral leases and other property interests within the unit so created.
 - 3. To designate a unit operator for the unit so created.
- 4. To provide that any wells drilled outside of the Planulina Zone, shall be in accordance with the spacing provisions of Statewide Order No. 29-E.
- 5. To provide that the Commissioner may reclassify the reservoir by supplemental order and without the necessity of a public hearing should such reclassification be warranted, based on evidence furnished the Commissioner.
 - 6. To discuss any other matters that may be pertinent to this application.

The Planulina Zone, Reservoir B, in the St. Amelia Field, St. James Parish, Louisiana, is hereby defined as being between the depths of 11910' and 13090' (electric log measurements) in the Twister Exploration - LeBeouf Real Estate No. 1 Well (S.N. 224209) located in Section 26, Township 12 South, Range 16 East, St. James Parish, Louisiana. The Planulina Zone, Reservoir B is further defined between the depths of 11830' and 13290' in the P.R. Rutherford - C. Graugnard Well No. 1 (S.N. 121681) located in Section 10, Township 12 South, Range 16 East, St. James Parish, Louisiana.

In addition to furnishing the legal notice to all Interested Parties, the applicant will provide for **POSTING** of the legal notice of the hearing and unit plat in a prominent place in the area of the St. Amelia Field, St. James Parish, Louisiana, and will cause the legal notice of the hearing to be **PUBLISHED** in a newspaper of general circulation published in the vicinity of the St. Amelia Field, St. James Parish, Louisiana, at least fifteen (15) days before the hearing date.

Any pertinent data relating to the proposed unit can be obtained, **AT THE COST OF THE REQUESTING PARTY**, from Leon E. Comeaux & Associates, P.O. Box 53922, Lafayette, Louisiana 70505, (337) 233-9839.

The Commissioner of Conservation has waived the 20 days preapplication notice in connection with this application and a conference to discuss the proposed unit and the basis thereof is hereby scheduled for 10:30 A.M. on, Tuesday, November 26, 2002, at the Offices of Leon E. Comeaux & Associates, 305 La Rue France, Lafayette, Louisiana.

There is no requirement for persons receiving this notice to attend or be represented at this conference. This is merely an invitation to all known Interested Parties to attend the conference should they so desire.

There is attached hereto and made a part hereof a plat outlining the proposed unit. Pursuant to the Revised Rules of Procedure, a list of names and addresses of the Interested Owners, Interested Parties and Represented Parties to whom this application is being sent is being furnished only to the Commissioner of Conservation and to the District Manager of the Lafayette District of the Office of Conservation. However, the list of parties will be provided to any party requesting a copy. A diligent effort was made to ascertain the names and addresses of all Interested Owners, Interested Parties and Represented Parties as required by the Revised Rules of Procedure.

Finally, there is enclosed our check on behalf of the applicant, BTA Oil Producers, in the sum of \$700.00 payable to the Office of Conservation and representing the required hearing application fee.

Sincerely,

LEON E-COMEAUX & ASSOCIATES

David Comeaux

DWC/af Enclosures

cc: Mr. Richard Hudson
Office of Conservation
825 Kaliste Saloom Rd.
Brandywine III, Ste. 220
Lafayette, Louisiana 70508-4284

Interested Parties, Interested Owners and Represented Parties

